

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

* **Criminal No. GLR 20-350**

ANDRE DAVIS

*

* * *

MOTION TO SET CONDITIONS OF RELEASE

Comes now the defendant, Andre Davis, by and through undersigned counsel, and requests this Court set conditions of release. In support of this request, Mr. Davis states:

1. Mr. Davis and co-defendants are charged in an Indictment with Racketeering Conspiracy in violation of 18 U.S.C. §1962(d). On October 26, 2020, Mr. Davis attended his initial appearance and was arraigned on the charges. He consented to detention at that time.

2. Mr. Davis is currently housed at Howard County Detention Center and was so detained at his initial appearance due to a pending charge in Baltimore City. Mr. Davis is represented by the Office of the Public Defender on that matter. He expects to have a bond review in state court within the next two weeks.

3. Mr. Davis intends to produce evidence that conditions of release can be set in this case including a third-party custodian and electronic monitoring. Mr. Davis also has health issues that are known risk factors for more severe consequences if he contracts COVID-19.

WHEREFORE, Mr. Davis requests that conditions of release be set in this matter.

Respectfully submitted,

Teresa Whalen

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